File (770)

ODP # 9-936

14 June 1979

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MEMORANDUM FOR: Chief, Management Staff, ODP

FROM   : [   ]
                  NFAC ADP Control Officer

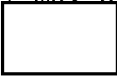SUBJECT   : Comments on Agency Review of Proposed Federal
                  Information Processing Standards Publication

REFERENCE   : Your memo, same subject, dated 30 May 1979

1. In response to your request in the cited reference, several NFAC offices (OCR, OER, OWI, OGCR) have reviewed the FIBS PUBS materials. Attached are the office submissions.

2. In addition to these comments, I would like to express my concern about the resource implications that a rigid Agency adherence to the FIBS PUBS might imply. Recently, our components have been besieged by requests from the records management area, security, audit staff, etc. for information about their ADP activities. NFAC has been able to provide the information, but not without sacrifice. The FIBS PUBS material makes reference to "a mechanism for measuring adherence to and assessing the impact of standards." How can Department of Commerce effectively monitor the Agency's ADP activities--especially in our highly classified activities? Would this type of monitoring be appropriate? What are the resource implications?

3. A second area of concern is the potential loss of efficiency in our ADP activities that might occur without a common sense application of any standard. I believe any standards that further impede our ability to develop or procure ADP software/hardware would be intolerable while standards which streamline these activities welcomed.

4. NFAC stands ready to review the FIBS PUBS as they become available. If I may be of any further help on this matter, please call on extension [   ]

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Attachments
  As stated

STATINTL

11 June 1979

MEMORANDUM FOR:

STATINTL

NFAC ADP Control Officer

FROM   :

OCR ADP Control Officer

SUBJECT   : Comments on Agency Review of Proposed Federal
             Information Processing Standards

REFERENCE : Your memo to OCR, OWI, OER and OGCR ADP/COs, dated
             4 June 79, same subject

1. OCR has no comments at this juncture in the Computer Science
and Technology Program Plan.

2. OCR supports the establishment of data processing standards
where such standards do not interfere with the efficiency of the
activities they encompass. We look forward to the opportunity to
review and comment on individual standards as they become available in
draft form.

REG/ga

STATINTL

15 June 1979

MEMORANDUM FOR: NFAC ADP Control Officer

FROM   :   OER ADP Control Officer

SUBJECT   :   Comments on Proposed Federal Information
                       Processing Standards

STATINTL

     1. In response to your request to review that small
mountain of information you sent me on proposed information
processing standards, I read the "Computer Science and
Technology Plan" fairly carefully and skimmed over the
"Guide for the Implementation of Federal Information Proces-
sing Standards for Acquisition and Design of Computer Products
and Services." ☐☐☐☐☐☐☐☐☐☐ of our Development and Analysis
Center also reviewed the material. We have comments that
address three broad areas of concern: (1) cost, (2) security,
and (3) technical factors.

Cost Considerations

     2. One of our major concerns with this program is
its cost. We are not talking only about the funded costs
mentioned in the Plan, but of the indirect costs as well.
It cost us something to review all the material you sent us,
for example, and it will cost us a great deal more in terms
of manhours diverted from productive work to implement such
a program. It also will cost us a considerable amount to
report on our adherence if the program is put into place.
I hope the proponents of this program are prepared to
incorporate the additional personnel ceilings and money
for us to do these things in their budget. It will cost
considerably more than the $20 mentioned in the Plan.

     3. We are pleased that the program includes cost/
benefit analysis for each standard or group of standards.
Unless that analysis addresses all the indirect costs
mentioned above, it will be of no value.

4. There is another type of cost that concerns us--the cost of converting existing programs to run under the new standards. This cost could well dwarf the costs of setting up and administering the standards program.

5. Our final concern about cost is what standards will do to our procurement costs. There is a good chance that many firms that manufacture high-quality, low-cost hardware will simply ignore a government standard because the government does not represent a large portion of their sales and because the manufacturers cannot afford the major changes that standards might imply. We may be forced to buy inferior equipment because it adheres to somebody's arbitrary conception of a standard.

Security Considerations

6. Our major concern about security is the prospect of having the Department of Commerce monitor Agency computer activities. Is this a serious prospect? Does Commerce have people who are cleared for this information? Do they have a need to know? If, by some enormous stretch of the imagination, Commerce does acquire a monitoring responsibility over the Agency, I hope funding will be adequate to cover all the costs of clearing personnel and maintaining secure facilities at Commerce. The funding should also include a substantial amount to cover the hospitalization of our own computer security people when they hear about this program.

Technical Considerations

7. Last, but not least, we are concerned about the technical implications of these proposed standards. For example, the standards clearly express a preference for an ASCII standard that would preclude other codes, like EBCDIC. We do not like the ASCII collating sequence for one thing. We also feel that mainframe architecture and system software should be designed for efficiency, and not for adherence to a standard. The material we reviewed implies that ASCII already is a world standard, but we take exception to that view. We process much tape-based data from foreign countries and have found virtually all of it to be EBCDIC.

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8. Another ASCII related question is whether we could buy IBM equipment any longer. It seems absurd to foreclose our option to buy products from the world's leading computer manufacturer for the sake of adhering to a set of standards that are questionable on other grounds.

9. We are concerned that there is no mention of PL/I in the proposed standards. Does this imply that those drafting standards are prepared to exclude PL/I as an acceptable compiler? PL/I can be an impediment to competitive bidding, so we suspect proponents of standards wish it did not exist. We rely on PL/I extensively, and find it a most efficient and productive language for our purposes. The loss of PL/I would cause a severe degradation of our programming productivity, and an even more severe degradation of the ODP batch processing systems if we were to turn to FORTRAN, for example.

10. We are also concerned about what standards will do to the quality of hardware and software that is retained under a standard. We are afraid what we will get is the lowest common denominator, that is, the version that has only the common elements of all existing versions and none of the enhancements that make one version superior to others for a given application. A standard in FORTRAN, for example, would not use the full capacity of the language as we now see it. ANS FORTRAN has no (END=, no INTEGER*2, no direct access, no hex constants, no implicit typing of variables, and no format codes. These are just a few examples of how standards can degrade a programming language. One can expect similar degradation wherever standards are applied.

11. You may gather from these comments that we do not enthusiastically embrace the concept of standards. We do not. If you have any questions about these comments, or can think of any way for us to get part of the [   ]   STATINTL
budget for this program in return for our time spent in
evaluating it, please contact me on extension [   ]   STATINTL

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